

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

RACHEL TUDOR,

Plaintiff,

v.

SOUTHEASTERN OKLAHOMA STATE
UNIVERSITY, and

THE REGIONAL UNIVERSITY
SYSTEM OF OKLAHOMA,

Defendants.

Case No. 15-cv-324-C

**UNOPPOSED JOINT MOTION TO STAY RESPONSE TO ATTORNEYS
YOUNG AND STEWART'S MOTION OPPOSING DR. TUDOR'S
RULE 41 DISMISSAL WITH PREJUDICE**

Plaintiff, Dr. Tudor, and Defendants, Southeastern Oklahoma State University, ("SEOSU"), and the Regional University System of Oklahoma ("RUSO"), ("Defendants"), jointly request the Court stay the parties' responses to Attorneys Young and Stewart's Motion Opposing Dr. Tudor's Rule 41 Dismissal with Prejudice. [Doc. 416]. In support of their motion, the parties state the following:

1. On July 14, 2022, former counsel for Plaintiff, Ezra Young and Brittany Stewart, filed their Motion and Brief Opposing Dr. Tudor's Rule 41 Dismissal with Prejudice. [Doc. 416].

2. The parties' responses to Attorneys Young and Stewart's Motion and Brief Opposing Dr. Tudor's Rule 41 Dismissal with Prejudice are due August 4, 2022.

3. On July 13, 2022, Young and Stewart filed a Joint Motion for Leave to Intervene. [Doc. 414] Plaintiff and Defendants have requested a fourteen (14) extension to

respond to the Motion for Leave to Intervene. [Doc. 414]. If granted, the parties' response date will be August 17, 2022. The parties will be filing a joint response.

4. The Motion for Leave to Intervene is based upon Young's and Stewart's contentions regarding their entitlement to attorney fees and costs.

5. Young's and Stewart's Opposition to Dr. Tudor's Rule 41 Dismissal is also based upon Young's and Stewart's contentions regarding their entitlement to attorney fees and costs.

6. Plaintiff and Defendants believe that this Court's ruling(s) regarding the Motion for Leave to Intervene, and proposed Complaint in Intervention, may significantly affect the parties' briefing and the Court's ruling(s) on Young's and Stewart's Opposition to Dr. Tudor's Rule 41 Dismissal.

7. For this reason, the parties request their response dates to Young's and Stewart's Opposition to Dr. Tudor's Rule 41 Dismissal be stayed until the Motion for Leave to Intervene, and the Complaint in Intervention, if permitted, has been fully briefed and resolved by the Court.

8. Attorneys Young and Stewart have no objection to the requested stay.

9. There will be no impact on any scheduled deadlines if the stay is granted.

For the reasons set forth above, Defendants respectfully request this Court stay Plaintiff's and Defendants' response dates to Young's and Stewart's Opposition to Dr. Tudor's Rule 41 Dismissal with Prejudice until the Court has resolved the Motion for Leave to Intervene and the proposed Complaint in Intervention.

Respectfully submitted,

/s/ Dixie L. Coffey

DIXIE L. COFFEY, OBA #11876

JEB E. JOSEPH, OBA #19137

TIM BUNSON, OBA #31004

Assistant Attorneys General

Oklahoma Attorney General's Office

Litigation Division

313 NE 21st Street

Oklahoma City, OK 73105

Telephone: 405.521.3921

Facsimile: 405.521.4518

Email: dixie.coffey@oag.ok.gov

Email: jeb.joseph@oag.ok.gov

Attorneys for Defendants Southeastern Oklahoma State University and The Regional University System of Oklahoma

/s/ Jillian T. Weiss

(signed with permission of counsel)

JILLIAN T. WEISS

Law Office of Jillian T. Weiss, PC

226 Prospect Park West, #104

Brooklyn, New York 112115

Telephone: 845.709.3237

Facsimile: 845.684.0160

Email: jweiss@jtweisslaw.com

Attorney for Plaintiff